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5		
6	Attorney for George Washington Sims, III	
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA ***	
8	UNITED STATES OF AMERICA,)
9 10	Plaintiff,))) CASE NO: 2:21-cr-00026-GMN-BNW
11	VS.) MOTION TO APPOINT CO-COUNSEL
12	GEORGE WASHINGTON SIMS, III,))
13	Defendant.))
14))
15	Defendant George Washington Sims, III, respectfully asks the Court to appoint Mr.	
16	James A. Oronoz as co-counsel for the defense. The nature and complexity of this case are	
17	such that the interests of justice require appointment of co-counsel and Mr. Oronoz, who is	
18	current counsel's law partner and already familiar with the case, is well suited to serve that	
19	role.	
20	This motion is made and based upon Guide to Judicial Policies and Procedures, Vol.	
21	7, Ch. 2 § 230.53.20(b), the attached memorandum of points and authorities, the pleadings,	
22	and papers on file herein, and any argument to be entertained by the Court.	
23	Dated: August 16, 2021	
24		espectfully submitted,
25		v: /s/ Thomas A. Ericsson nomas A. Ericsson, Esq.
26	Oi	ronoz & Ericsson, LLC
27		950 Indigo Drive, Suite 120 as Vegas, Nevada 89145
28	At	torney for George Washington Sims III

MEMORANDUM OF POINTS AND AUTHORITIES

A. BACKGROUND

This is an alleged case of Sex Trafficking of Children, Sexual Exploitation of Children and Transportation of a Minor with Intent to Engage in Criminal Sexual Activity in which the government alleges that Mr. Sims affected interstate and foreign commerce by recruiting and enticing three (3) girls under the age of 18 to be engaged in a commercial sex act. The government alleges that Mr. Sims also employed, persuaded, and coerced the minor individuals to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct; knowing the visual depictions would be mailed, shipped, or transported in and affecting interstate and foreign commerce, including by computer. Allegations also include that Mr. Sims did knowingly transport these minor individuals with the intent that these individuals would engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

This case will go to trial, and presumably the government will be represented at trial by two attorneys in addition to support staff. Mr. Sims should likewise have the benefit at trial of two defense attorneys given the nature and complexity of this case.

B. APPOINTMENT OF CO-COUNSEL

This case warrants the appointment of co-counsel because it is extremely difficult, voluminous, and complex. *See Guide to Judicial Policies and Procedures*, Vol. 7, Ch. 2 § 230.53.20(b). This case involved the alleged transportation of three (3) under-age female individuals across the state lines of California and Nevada, the exploitation of under-age females with the intent to force them into prostitution or other behavior of a sexual nature.

On July 27, 2017, the undersigned was appointed to represent Defendant George Washington Sims, III, in this matter (*See ECF No. 95*). To date, the Government has produced 10,658 pages of discovery, 207 photographs, 1,513 audio files and 54 video files, which comes to an accumulated total of 58 GB of discovery. We have also been advised that there is an additional 46 GB if discovery that will need to be reviewed and examined to develop a defense strategy. Counsel has begun to review the massive amount of discovery and has determined a second experienced attorney is needed to properly represent Mr. Sims. The combined effect is to make this case extremely difficult and complex such that appointment of co-counsel is necessary and appropriate in the interest of justice.

The defense's preferred co-counsel, Mr. Oronoz, is current defense counsel's law partner, a member of the CJA panel, with over twenty (20) years of experience in civil and criminal litigation. Mr. Oronoz is capable, well-qualified, and more than willing to assume co-counsel duties.

For all these reasons, the defense respectfully asks that the Court enter an order appointing Mr. Oronoz co-counsel for Mr. Sims.

DATED this 17th day of August 2021.

Respectfully Submitted by:

/s/ Thomas A. Ericsson
THOMAS A. ERICSSON, ESQ.
1050 Indigo Drive, Suite 120
Las Vegas, NV 89145
Counsel for George Washington Sims, III

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6	Attorney for George Washington Sims, III	
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	***)	
9	UNITED STATES OF AMERICA, Plaintiff,)	
10	CASE NO: 2:21-cr-00026-GMN-BNW	
11	vs. ORDER APPOINTING CO-COUNSEL	
12	GEORGE WASHINGTON SIMS, III, Defendant.	
13)	
14)	
15		
16	GOOD CAUSE APPEARING, it is hereby ORDERED that the Clerk of the Court shall	
17		
18	notify the CJA appoint authority for the District of Nevada of the appointment of attorney	
19	James A Oronoz as co-counsel for defendant George Washinton Sims, III.	
20		
21		
22		
23	Ordor	
24	<u>Order</u>	
25	IT IS SO ORDERED	
26	DATED: 1:24 pm, August 20, 2021	
27	Berbweter	
28	BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE	